

M/029/0001

7482

Leslie Heppler <lheppler@utah.gov>

Outgoing

**Draft Review - Devils Slide M/029/0001**

1 message

Leslie Heppler <lheppler@utah.gov>

Mon, Aug 29, 2016 at 3:53 PM

To: Mike Toelle <mike.toelle@lafargeholcim.com>, Tom NEWMAN <tom.newman@lafargeholcim.com>

Cc: Paul Baker <paulbaker@utah.gov>

The attached review is a **draft** copy of the OGM review of your latest submittal received on July 29, 2016. The edited copy of the review will be finalized, signed and sent out as soon as possible. Certain portions of the review are incomplete at this time, due to either lack of information, incomplete information, or inconsistent data in the NOI.

The following areas of the permit have not been reviewed at this time:

- Surety Calculation - Specifically the Division needs a hard copy **and** an electronic copy of the bond calculations

All of the above sections will be reviewed in your finalized, signed review.

It is the goal of OGM to send out the most thorough and detailed review possible as per R647-4-101. 1.

If you have any further questions please don't hesitate to call me at [801-538-5257](tel:801-538-5257) thx-lah

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Utah Division of Oil, Gas & Mining

Office hours - Mon thru Fri 8-5

[\(801\) 538-5340](tel:801-538-5340)

Leslie Heppler

lheppler@utah.govDirect line [\(801\) 538-5257](tel:801-538-5257) (Mon -Thur)

Thank you for reading this electronic correspondence.

Please consider the environment before printing.

**REV6-7482-08112016 emailcopy.doc**

229K

DRAFT

August 11, 2016

Michael B. Toelle
Holcim (U.S.), Inc
6055 East Croydon Road
Morgan, Utah 84050

Subject: Sixth Review of Notice of Intention to Commence Large Mining Operations, Holcim (U.S.) Inc., Devils Slide Quarry, M/029/0001, Morgan County, Utah

Dear Mr. Toelle:

The Division of Oil, gas and Mining has completed a review of the Notice of Intention to Commence Large Mining Operations (NOI) for the Devil's Slide Mine, which was received July 29, 2016. The attached comments will need to be addressed before tentative approval may be granted.

The comments are listed under the applicable minerals rule heading; please format your response in a similar fashion. Please address those items requested in the attached technical review and submit the NOI as a complete document using redline and strikeout text. After the notice is determined technically complete and the Division is prepared to issue final approval, you will be asked to submit two clean copies of the complete and corrected plan. Upon final approval of the permit, the Division will stamp both copies approved and return one for your records.

The Division will suspend further review of the NOI until receiving your response to this letter. Please contact Leslie Heppler at 801-538-5257 or me at 801-538-5261 if you have questions about the review. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: lah: eb
Attachment: Review
cc: lgarahana@blm.gov
O:\M029-Morgan\M0290001-DevilsSlide\draft\REV6-7482-08112016.doc

**Sixth REVIEW OF NOTICE OF INTENTION
TO COMMENCE LARGE MINING OPERATIONS**

Holcim (US) Inc.

Devil's Slide Mine

M/029/0001

August 11, 2016

General Comments

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|---------------------------------|--|----------|------------------|
| 1 | General | The Division may have additional comments based on future submittals. Every attempt should be made by the Operator to submit a complete NOI. | lah | |
| 2 | | <i>The plan received is incomplete. Both Appendices, Appendix 2, the Chemical and Toxicity Analysis of Kiln Dust, and Appendix 4, Holcim (US) Devils Slide Quarry Interim Drainage Study, were deleted from the NOI.</i> | lah | |
| | | Now missing is appendix 5 and 6. Appendix 6 is the 2002 Overburden dump Revision which is not provided at this time. These items are on the Divisions web site. Is it the intent of the Operator to provide 2 clean copies of the entire document prior to approval? | lah | |
| 3 | Page 6 Para 3 | As written "ACT/029/001", Please rewrite to "M/029/0001". In addition, also on page 8 (6.) note Current Permit ID as M/029/0001. In addition cover page notes M/029/001, please change to M/029/0001. | lah | |
| 4 | List of Appendices Page 5 | On page 5 Appendix 1 is listed as "Final Mine Plan design..." but Appendix 1 is the list of figures, which also happens to be listed on page 4. Please fix which one is in error. | lah | |
| 5 | Omission | Appendix 8 was not included in this submission. Can the Division assume the report is the signed and stamped 2013 document? | lah | |

R647-4-104 - Operator's, Surface and Mineral Ownership

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 6 | Omission | <i>From the Division's June 16, 2011, review - Submit a mineral and surface ownership map and include ownership of adjacent property.</i> | lah | |
| | | <i>Please submit the address for Joseph Toone.</i> | | |
| | | According to Morgan County Records – the Toone address is | lah | |
| | | Lurene Toone Trust 223 West 2280 North #105 Provo, UT 84604-0000 | | |

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------|---|----------|---------------|
| 7 | Page 8 | As written "...land surface:, rewrite to "...land surface: (see figure 105.1a)" In addition on page 9, number 10. Add (see figure 105.1a) | lah | |
| 8 | Page 9 | Remove BLM, as the status is none | lah | |

R647-4-105 - Maps, Drawings & Photographs

General Map Comments

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------|---|----------|---------------|
| 9 | Page 7 | Add date of the Google earth image in the text below and add north arrow adjacent to the photo. | lah | |
| 10 | All figures | For future reference – It is engineering standard for the figure or map identification number to be in the lower left hand cornering of the drawing. (No action needed). | lah | |
| 11 | Figure 1 | <i>Previous Comment - Figure 1 is included but not listed in the Appendix. Please list in the appendix and refer to the drawing under appropriate sections, including the surety section.</i> There still is no figure 1 (which is not really important). As written – “Appendix 1 – Final Mine Plan Design for Quarries 1 and 2”. Which are actually all the figures for the NOI. See comment above. Please remove all reference to figure 1. | lah | |
| 12 | Figure 105.1a | Change US Gov to BLM (to be consistent to page 9) | lah | |

105.2 - Surface facilities map

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------------------|---|----------|---------------|
| 13 | Figure 105.3 | <i>Previous comment - Drill holes are shown on the maps but not numbered. The Division needs an accounting of what drill holes need to be plugged and how much it would cost (depth and diameter). Ideally, the plan should include a table that is tied to the figure and the bond calculation.</i> New comment - Page 21 refers to drill holes, with a good description. Please add to your Table of Content “108 – Hole Plugging” | lah | |
| 14 | Figures 105.2c 105.3b 105.3c | <i>Previous comment 8 - ... Is the “processed waste facility” identified on the figure 105.4d the same as the cement kiln dust storage area? If so, modify the name to be clear.</i> New comment - Not yet addressed. Alternatively, identify of what “Processed Waste” consists in the section 106.2 text. | pnb | |

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|---|---|----------------|------------------|
| 15 | Figure 105.2c 105.3b 105.3c | <i>Previous comment 9 - Show the current and past disposal locations of cement kiln dust on the reclamation treatment map(s), as required by R647.4.110.4.</i> New comment - Historical aerial photos suggest that processed waste and/or cement kiln dust (CKD) has been deposited in a significantly bigger area than that shown as green on this map. Correct maps to show both past and future disposal areas, or clarify. | pnb | |
| 16 | Figures 105.2a 105.2c 105.3b 105.3c | Historical photos suggest that CKD may be stockpiled both north of the blending facilities on a pad on the hillside, and northwest of the maintenance shop. If so, identify these areas on the maps. Locations of coal and other introduced or produced materials requiring special disposal or removal should also be identified. | pnb | |
| 17 | Figure 105.3 | <i>Previous comment 21 - Please show the cement kiln fines location as well [on Figure 109.1].</i> Since the original Figure has been removed, identify the Process Waste and/or CKD locations on the Hydrology Map A. | pnb | |
| 18 | Figure 105.3b | Contours suggest that mining will intercept the Processed Waste Area. Correct boundaries as needed, or identify in the text of section 110.4 how CKD and other processed waste will be isolated. | pnb | |
| 19 | Figure 105.4 | <i>Previous comment - Map includes post mining reclamation treatments. This clutters up the map showing surface facilities. Please put these CAD layers on a separate map clearly defining what is to be reclaimed in the future.</i> New comment – All Maps have been improved. A post mining reclamation treatment maps is needed. | lah lah | |

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------------|--|----------|------------------|
| 20 | Omission Figure 1051c | <i>From the Division's June 16, 2011, review - Please include a geologic map.</i> <i>Previous comment 2015 - Please color the portion of the map that applies to the mine, include portion of legend that applies to the mine.</i> New comment - Geology map is still Difficult to read. The online "Utah Geological Survey map portal" has .tiff files that can be downloaded. The "Ogden quad" might work better. Or as an alternative blow up the info need at the mine site. | lah | |
| 21 | All Cross sections | Slope angles on the cross sections need to be labeled, include maximum or minimum as appropriate. | lah | |
| 22 | Cross Sections | Give a figure number to match the rest of the figures, such as 105.*.* Cross section should have current topography and post mine topography. It is the recommendation of the Division to reduce the vertical exaggeration. | lah | |
| 23 | Cross section | Quarry #3 – Please check the labels on the cross section, as currently labeled it appears the pits will be backfilled, which is not consistent with 105.3b | lah | |

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 24 | Cross section | One of the cross sections pages is labeled in the title block as "Quarry #3" but the other cross section is labeled differently, ie without reference to any of the pits. | lah | |
| 25 | Cross section Omission | To support the request for variance and section 109.4 provide a detailed cross section(s) of the typical bench/slope angle/toe to crest angle for the different pits. | lah | |

R647-4-106 - Operation Plan

General Operation Comments

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 26 | General | Numerous times throughout section 106, the NOI refers to previous plans. Please copy appropriate information and include in the NOI. This needs to be a stand-alone document. | lah | |

106.2 - Type of operations conducted, mining method, processing etc.

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 27 | Page 10 Para 5 | <i>Previous Comment - The small sandstone pit needs to be included in cross sections and post mining reclamation.</i> New Comment – Reference has now been made to the sandstone quarry, but it is not clear if it will be mined with 45 degree slopes. In addition the sandstone quarry needs to be addressed throughout the plan (ie cross sections are needed and reclamation plan is needed. | lah | |
| 28 | Page 12 | Identify what comprises "Processed Waste" (e.g. CKD or other waste material). | pnb | |
| 29 | Page 12, Omission | <i>Previous comment 10 - Based on the chemical analysis provided, it appears that kiln dust should be classified as deleterious. Please modify this section of the NOI accordingly...</i> New comment - Not addressed. Identify the CKD as deleterious. "Deleterious materials" are defined in the Division's rules in R647-1-106 (Definitions). | pnb | |
| 30 | Page 12, Omission | <i>Previous Comment 11- Identify other deleterious materials (such as fuels and other chemicals) that are or will be present in significant amounts...</i> New comment - Not addressed. Identify the types of deleterious materials (e.g. fuels, lubricants, and other chemicals) that are or will be present. The Division considers volumes of tanks associated with equipment fueling and maintenance as significant. | pnb | |

106.3 - Estimated acreages disturbed, reclaimed, annually

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|----------|----------|------------------|
|-----------|-------------------------------|----------|----------|------------------|

106.4 – Nature of materials to be mined or processed including waste; estimated annual tonnages

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|----------|------------------|
| 31 | 106.4, Omission | <i>Previous comment 12 - Describe the nature of the cement kiln dust... Discuss briefly ... the significance of the results of testing reported in Appendix 2.</i> New comment - Partially addressed. The pH (over 12) and concentrations of a few notable metals should be stated to reflect the true nature of CKD. See the next comment. | pnb | |

106.8 - Depth to groundwater, extent of overburden, geology

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 32 | 17 | <i>Previous comment - Discuss in the text the elevation of the ground water in the water well and the proposed pit. Groundwater was noted during an inspection.</i> New comment - Please restate ground water in terms of elevation in feet (such as: the ground water table averages 52** feet plus or minus 2 feet). In addition, it is written that no exploration drill holes have intersected water. Please add elevational information, include the elevation depth of the drill holes (such as: no water was encountered in exploration drill holes with a final depth of 52** feet), the final pit floor elevation and refer to the different pits elevations. | lah | |
| 33 | 106.4, Omission | <i>Previous comment 15 - Based on the results in Appendix 2 and general cement kiln dust characteristics, the Division currently considers these materials to be deleterious. ...Please provide the results of additional elemental and SPLP leach analyses...from statistically adequate samples of cement kiln dust that are representative of current and, if possible, future production. Include the same metals as previously analyzed, and add TDS to the list of SPLP analytes...</i> New comment - Not addressed. Given the pH and, to a lesser degree, a Geochemical Abundance Index analysis of the CKD, the Division considers CKD to be deleterious. Alternatively, you could identify, handle, and dispose of CKD as a deleterious material (which is defined differently than hazardous waste). | pnb | |
| 34 | 18 | <i>Previous comment - There is no discussion on the extent of the overburden or geology. Please add the geology from the 1987 reclamation plan into the current NOI. Refer to the geology map (which has yet to be submitted).</i> New comment - Thank you for submission of the geology map (see comment above) and refer in section 106.8 to the geology map. | lah | |

106.9 - Location & size of ore, waste, tailings, ponds

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 35 | Pg 18 Para 3 | "Holcim possesses a General Stormwater Permit issued by the State of Utah (UT-664." The Division had a phone conversation with UDWQ who indicated that the site actually has two General Permits. Please reference both permits in this paragraph. | mpb | |
| 36 | Page 18 Last para | Typo - As written "... (approximately 35 degrees vertical)..." Please fix the typo and delete the word "vertical". | lah | |

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------|--|----------|---------------|
| 37 | Page 17 para 6 & 7 | <i>Previous comment 17 - Report... the maximum volume of cement kiln dust that would be stored in the active cement kiln dust stockpile area.</i> New comment - Not yet addressed. What is the capacity of the current CKD stockpiles and dump? Will this amount be adequate for the remaining mine life? | pnb | |
| 38 | Page 19 para 3 | <i>Previous comment 18 - Indicate whether there is a liner under the kiln dust stockpile and dump.</i> New comment - Not fully addressed. Report where liners are present relative to both the new and old CKD disposal areas. Identify the liner types and thicknesses. | pnb | |

R647-4-109 - Impact Assessment

109.1 - Impacts to surface & groundwater systems

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------|--|----------|---------------|
| 39 | Appendix 9 | Please reference the second SWPPP that UDWQ stated Holcim has for this site. | mpb | |

109.4 - Slope stability, erosion control, air quality, safety

| Comment # | Sheet/Page/Map/Table # | Comments | Initials | Review Action |
|-----------|------------------------|--|----------|---------------|
| 40 | Page 33 | <i>Previous comment - The slope stability section needs to follow the recommendations in Appendix 8.</i> New comment – It is not necessary to copy the geotech report into the text of the NOI, but a simple statement that “the operator will implement the recommendations of the geotech report in Appendix 8” and highlight in the NOI text the slope angles for the different pits (ie leave out methodology and stick to FOS, conclusions and recommendations). | lah | |
| 41 | Omission | Slope stability in the Sandstone Quarry has not been addressed. Also need to include x-section of the Sandstone Quarry. | lah | |
| 42 | Page 25 Para 2 | Change first sentence to “...not anticipated to decrease slope stability below acceptable Factors of Safety.” If that is the intent of the Operator. | lah | |
| 43 | Page 25 Para 2 | Fix typos in third sentence to “Waste material in the Bone Yard and Quarry Hollow is placed at *”; as 3H:1V is not angle of repose, so both can’t be true. I assume it is the operators intent to place a 3H:1V, as the fourth sentence notes “very stable”. | lah | |
| 44 | Page 25 Para 3 | Not much actual information is actually noted regarding the slope stability of the Waste dumps in the paragraph. It would be best to actually state – “Waste dumps will be end dumped at the angle of repose, then regraded during reclamation to less than 3H:1V” If the above statement is the intent of the operator. | lah | |
| 45 | Page 25 Para 4 | Fix typo in sentence 6 “...a minimum factor of safety (1.0) will be maintained.” As the recommendations on page 27 notes a FOS of 1.25 and in addition in paragraph 4 the minimum FOS is noted to be 1.22. | lah | |

Page 8 of 11
Michael Toelle
M/029/0001
August 11, 2016

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|----------|------------------|
| 46 | Page 25 Para 4 | Sentence 1 - Please provide typical cross section(s) for the proposed highwall configurations. | lah | |
| 47 | Page 27 Para 5 | As all geology is not consistent, please repeat the second to the last sentence on Page 25, para 5 | lah | |

R647-4-110 - Reclamation Plan

110 - General

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|----------|------------------|
| 48 | Attachment 6 | The Reclamation Plan map identified as Attachment 6 is nearly 30 years old. Please provide an updated Reclamation Plan that includes final topography, drainage controls, restored drainages, reclamation treatments and any other information required in R647-4-105.3.17. Please rename the map from "Attachment 6" to something consistent with the rest of the figures and maps in the NOI (Figure 110a or similar). If necessary, provide two figures to show the required reclamation information. | mpb | |

110.2 - Roads, highwalls, slopes, drainages, pits, etc., reclaimed

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|-----------------------|------------------|
| 49 | Page 37 Para 1 | <i>Previous comment - From the Division's June 16, 2011, review - Please show on reclamation maps the minor access road to be left.</i> New comment – Figure 105.3c has several minor roads labeled, but none are labeled as minor access road to be left. It is the recommendation of the Division to fix the Legend on 105.3 c as comments are not part of the NOI. It is not clear if all the labeled roads are needed, specifically roads that don't access anything after reclamation is complete. | lah lah lah | |
| 50 | Page 29 Para 3 | It is the recommendation of the Division to reduce the width of the crushed limestone main haul road, as there will be less long term maintenance for the radio towers and property owners. | lah | |
| 51 | Page 37 Para 2 | <i>Previous comments - From the Division's June 16, 2011, review -The Division can't locate Exhibit 105.6 but can find Figure 105.6. Figure 105.6 is very generalized and needs more detail.</i> <i>Holcim comment notes "there is no Exhibit 105.6." On the list of figures the "Reclamation Treatment" map is noted as 105.6. This is a critical map. Please submit the reclamation treatment map.</i> New comment – Thank you for the figure 105.3 c . More please info needs to be presented on the figure, such as highwall areas and the highwall reclamation treatments, dump areas and the dump reclamation treatments and anticipated final contours. | lah lah | |

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 52 | Page 37 Para 5 & 6 | <i>Previous comment - Show on reclamation map the benches that are proposed to be reclaimed and to be seeded.</i> | lah | |
| | | <i>Holcim response - See figure 105.5c. No treatment is shown on map 105.5c, and the topographic contours do not match the geotech report.</i> | lah | |
| | | New comment – Figure 105.3b notes all areas will be reseeded, but it is my understanding the haul road will remain for access, with a limestone base rock, please show on the map. | lah | |
| 53 | Page 30, Waste Dumps | <i>Previous comment - Identify whether additional cement kiln dust waste dumps will be disposed of. Identify reclamation plans for any future kiln dust dumps. It isn't clear if the Stockpiles section applies to marketable kiln dust piles or not.</i> | pnb | |
| | | New comment - Possibly not yet addressed. See Section 110.4. | | |

110.3 - Description of facilities to be left (post mining use)

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|----------|------------------|
| 54 | Page 39 | <i>Previous comment - From the Division's June 16, 2011, review - As noted above, any road or pond to be left at the request of the private landowner needs to be documented and shown on the reclamation map.</i> | lah | |
| | | <i>The comment from Holcim says to see Figure 109.1, but no private landowner's roads are shown on Figure 109.1</i> | lah | |
| | | New comment – No further comment needed as roads are addressed under 110.2 | lah | |

110.4 - Description or treatment/disposition of deleterious or acid forming material

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 55 | Page 40 | <i>Previous comment - From the Division's June 16, 2011, review - Bonding is based on worse case conditions; please list the maximum amount of deleterious materials.</i> | lah | |
| | | <i>Also list fuels and other petroleum products used at the site.</i> | lah | |
| | | New comments – As noted above, please provide bond sheets | | |
| 56 | Page 31 | <i>Previous comment 33 - Update this section to address both active (product) and any waste kiln dust piles, and refer to the Reclamation Treatments map to show the location of deleterious materials. How will kiln dust be "... safely removed from the site or left in an isolated or neutralized condition such that adverse environmental effects are eliminated or controlled" (R647-4-111.4)?</i> | pnb | |
| | | New comment - Not yet addressed. Explain of what "processed waste" consists (e.g. CKD), and whether it continues to be disposed of on a clay liner with an underlying French drain. Identify the cover thickness (past and future) over any deleterious material. | | |

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 57 | Page 32 | <i>Previous comment 34 - Identify plans for removal of other deleterious materials listed in section 106.2.</i> New comment - Not completely addressed. Identify removal and/or disposal plans for any deleterious materials that may not be recyclable or consumable (e.g. coal). | pnb | |
| 58 | Page 35 | This page should probably be deleted from the NOI. | lah | |

R647-4-112 - Variance

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|---|----------|------------------|
| 59 | Page 37 para 1 | As written "...would be submitted." Please change to "...would be submitted with the appropriate documentation justifying the proposed future request for variance." | lah | |
| 60 | Page 38 | Paragraph 1 has several typos and should probably be deleted. Paragraph 2 should include the statement "A geotechnical slope stability investigation has been completed and is attached as appendix 8 as justification for the request for variance." | lah | |

R647-4-113 – Surety

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|-------------------------------|--|--------------------------------------|------------------|
| 61 | Appendix 3 | <i>Previous comment - From the Division's June 16, 2011, review - Please use the Division's spreadsheets to compute the reclamation cost estimate. The spreadsheets are available at the Division's webpage. Please provide the Summary sheet with the indirect costs from the Division's web page.</i> New comment - Please provide a printed copy of the spreadsheet for the e-files on the web site. <i>Previous comment - Add Total Acres to the Summary sheet</i> New comment - Please add the actual number of acres next to the line "Total Acres" | whw lah lah lah | |
| 62 | Reclamation cost estimate | The Division will have further comments about the reclamation cost estimate after receiving adequate responses to the comments in this review. | pbb | |
| 63 | Appendix 3 | <i>Previous comment 40 - Add costs to remove or properly dispose of (such as to adequately cover) cement kiln dust stockpiles that may remain on-site after mining.</i> New comment - This comment will be evaluated when the reclamation cost estimate calculations are received. | pnb | |

Appendix

| Comment # | Sheet/Page/ Map/Table # | Comments | Initials | Review Action |
|-----------|----------------------------------|--|----------|------------------|
| 64 | Appendix 2 2015 Data | Identify the units of analyte concentrations in the 2015 CKD analysis. | pnb | |
| 65 | Appendix 2 | Note: Water analyses discussed in the Holcim response to previous comment New 10 were not included. | pnb | |
| 66 | Appendix 2 | Include the analytic results of any leach testing (e.g. SPLP), if performed. | pnb | |
| 67 | Appendix 8 Page viii | <p><i>Previous comment - From the Division's June 16, 2011, review- Executive summary needs to include recommendations by the designer of record with FOS.</i></p> <p><i>Several places in the report, including but not limited to page 1, para 4 ("specified by DOGM"); page 32, para 1("required"); page 60 #17 as per DOGM review, indicate the Division has "required a certain factor of safety." Rule 647 does not require any FOS, but the requesting of the variance requires justification for adequate stability. Please rewrite text to reflect rule.</i></p> <p>New comment – A new appendix 8 was not submitted at this time</p> | lah | |
| 68 | Appendix 8 General Comment | <p><i>Previous comment - From the Division's June 16, 2011, review- Write report in all English units and not in part metric units. Use H to V.</i></p> <p><i>Please include the H to V in slope designations, such as on page 2: 1H:1V, 1H:1.37V, and 1H:1.5V. This comment applies to all of Appendix 8 and the document.</i></p> <p>New comment – A new appendix 8 was not submitted at this time</p> | lah | |
| 69 | Appendix 8 Page 40 | <p><i>Previous comment - From the Division's June 16, 2011, review- Figure 6 should be included in the NOI, showing maximum OA for each orientation of slope.</i></p> <p><i>Figure 1 should be added to the NOI.</i></p> <p>New comment – A new appendix 8 was not submitted at this time</p> | lah | |